



# AKRON REGIONAL AIR QUALITY MANAGEMENT DISTRICT

Agent of the Ohio Environmental Protection Agency \* A Service of Summit County Public Health \* Serving Medina, Portage and Summit Counties

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Sam Rubens, MPA, R.S.  
Administrator

January 28, 2019

## CERTIFIED MAIL

Mr. Michael Steele  
A. Schulman Inc – Akron Plant  
790 East Tallmadge Avenue  
Akron, OH 44310

Re: A. Schulman Inc – Akron Plant  
Notice of Violation (NOV)  
Air Permit  
Summit County  
1677010025

## Subject: Notice of Violation

Dear Mr. Michael Steele:

Thank you for accompanying me during Akron Regional Air Quality Management District's (ARAQMD) January 23, 2019 inspection of the A. Schulman facility at 790 E Tallmadge Ave. in Akron, Ohio. The inspection included a review of facility operations and the written documentation associated with those operations. During the site inspection, I noted that the pressure drops in the baghouses/dust collectors serving the units designated P910, P911, P912, and P913 were outside of the range allowed by the permit. Records for the baghouses/dust collectors were not kept for the required 5 years, only going back to 2015. Additionally, the required daily record for the visible emissions checks for the units designated P003, P909, and P914 was not kept. The burn-off oven designated N001 repeatedly operated below the required temperatures and the records for 2015 and 2016 were incomplete for the unit. Listed below are "Finding(s)" followed by "Violation(s)" (if applicable) and the "Requested Action(s)" necessary to address the stated findings and violations.

## Findings

1. The dust collectors serving P910, P911, P912, and P913, described by the facility as Extrusion line 7, Extrusion Line 8, Line 4 and Line 6 respectively, were operating at pressure drops between 1 to 3 inches of water both during the inspection and throughout the records.
  - a. **Rule Citation:** Ohio Revised Code (ORC) 3704.05(C): *"No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code Shall violate any of its terms or conditions."*  
Permits-to-Install and Operate (PTIO) P0109275, P0114987, and P0115059 Terms and Conditions d)(1): *"The acceptable range established for the pressure drop across the baghouse is between 6.0 to 12.0 inches of water."*
  - b. **Violation:** Failure to operate the control device within the allowable range is considered a violation of ORC 3704.05(C).
  - c. **Requested Action:** Within 30 days of the receipt of this letter, A. Schulman will submit documentation from the manufacturers of the control devices demonstrating the proper

operating conditions of the baghouses/dust collectors, and will then submit applications for administrative modifications to the relevant permits to have them reflect these conditions. Additionally, the facility will enact any steps required to bring the units into the manufacturers' recommended ranges and submit documentation of those steps.

2. The units designated P003, P909, and P914, described by the facility as Silos 5-8, Extrusion line 5, and Lines 1 and 2 respectively, did not have the required records of the daily visible emissions checks.
  - a. **Rule Citation:** Ohio Revised Code (ORC) 3704.05(C): *"No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code Shall violate any of its terms or conditions."*  
Permit-to-Install and Operate (PTIO) P0107987 Terms and Conditions d)(1) and P0115301 Terms and Conditions 2.d)(1) and 3.d)(1): *"The permittee shall perform daily checks... for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points... The presence or absence of any visible emissions shall be noted in an operations log."*
  - b. **Violation:** Failure to perform and record the daily visible emissions check is considered a violation of ORC 3704.05(C).
  - c. **Requested Action:** Within 30 days of the receipt of this letter, A. Schulman will submit documentation demonstrating that they are performing and recording the daily visible emissions checks.
3. The records for the burn-off ovens designated N001 were incomplete for the years 2015 and 2016; the oven was run without recording the temperature of the secondary combustion chamber.
  - a. **Rule Citation:** Ohio Revised Code (ORC) 3704.05(C): *"No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code Shall violate any of its terms or conditions."*  
Permit-to-Install and Operate (PTIO) P0115301 Terms and Conditions 1.d)(1): *"The permittee shall record the secondary combustion chamber temperature prior to each batch operation."*
  - b. **Violation:** For multiple time frames in the years 2015 and 2016, the temperature in the secondary combustion chamber was not recorded; this issue was not present in the more recent records. Failure to record the temperature in the secondary combustion chamber is considered a violation of ORC 3704.05(C).
  - c. **Requested Action:** Within 30 days of the receipt of this letter, A. Schulman will submit a compliance plan detailing methods of ensuring that the temperature of the secondary combustion temperature in the N001 unit will be recorded each time the unit is in operation.
4. The records for the burn-off ovens designated N001 showed that the unit is routinely operated at temperatures below the required 1400°F. This typically resulted from technicians starting the cycle with the oven operating around 1350°F so that they could leave for the weekend. In cases where this was denoted, no investigation was performed into the deviations. In the few remaining instances, the company performed the proper investigation into the deviations, but failed to report them with the annual Permit Evaluation Report.
  - a. **Rule Citation:** Ohio Revised Code (ORC) 3704.05(C): *"No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code Shall violate any of its terms or conditions."*  
Permit-to-Install and Operate (PTIO) P0115301 Terms and Conditions 1.c)(2): *"The secondary combustion chamber of the emissions unit shall operate so that the exhaust*



gas is a minimum of 1,400°F until the wastes are completely combusted and the burn-down cycle is complete."

- b. **Violation:** The unit operated at a temperature below the required values consistently, including 10 instances between 10/1/18 and 12/1/18. Failure to reach the temperatures required for the exhaust is considered a violation of ORC 3704.5(C).
  - c. **Requested Action:** Within 30 days of the receipt of this letter, A. Schulman will submit a compliance plan detailing methods to ensure that the burn-off ovens reach the required temperature of 1,400°F before operating the emissions unit.
5. Records for the dust collectors and burn-off ovens were only kept back to the start of 2015, rather than the required 5 year period for records retention.
- a. **Rule Citation:** Ohio Revised Code (ORC) 3704.05(C): *"No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code Shall violate any of its terms or conditions."*  
Permit-to-Install and Operate (PTIO) P0115301 Standard Terms and Conditions A.3.: *"You must keep all records required by this permit... for five years from the date the record was created."*
  - b. **Violation:** Failure to keep the required records for the full five year period is considered a violation of ORC 3704.5(C).
  - c. **Requested Action:** Within 30 days of the receipt of this letter, A. Schulman will submit a compliance plan detailing methods to ensure that records are kept for the full 5 year period required by the standard terms and conditions.

### **Conclusion**

ARAQMD requests that A. Schulman promptly undertake the necessary measures to return to compliance with Ohio's environmental laws and regulations. Within 30 days of receipt of this letter, please provide the requested information in writing to ARAQMD. Failure to comply with Chapter 3704 of the Ohio Revised Code and the rules promulgated thereunder may result in an administrative or civil penalty. If circumstances delay resolution of the violations, A. Schulman is requested to submit written correspondence describing the steps that will be taken by date to attain compliance.

Please note that the submission of any requested information to respond to this letter does not constitute a waiver of the Ohio EPA's authority to seek administrative or civil penalties as provided in section 3704.06 of the Ohio Revised Code.

Thank you for your time and cooperation and if you have any questions, please do not hesitate to contact me by phone at (330) 812-3947 or by e-mail at [cmoroney@schd.org](mailto:cmoroney@schd.org).

Sincerely,



Connor Moroney  
Air Quality Engineer

ec: John Paulian/James Kavalec, DAPC/CO  
Duane LaClair/Sam Rubens, ARAQMD  
Brian Dickens, USEPA Region V